

REMARKS

Claims 1-8 are pending. Claims 5-7 have been withdrawn from consideration. By this response, claims 1 and 4 are amended. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

35 U.S.C. § 112, Second Paragraph

Claim 4 stands rejected under 35 U.S.C. § 112, second paragraph as being indefinite. Specifically, it is alleged that claim 4 mixes statutory classes of the invention by appearing to inject a method step into an apparatus claim. In response, Applicants have amended claim 4 in order to alleviate any confusion or appearance of mixing statutory classes of the invention. Accordingly, reconsideration and withdrawn of the rejection are respectfully requested.

Prior Art Rejection

Claims 1-4 and 8 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Nomura (U.S. 5,919,245). This rejection is respectfully traversed.

As amended, independent claims 1 and 4 each recite, *inter alia*, link identification information identifying a plurality original links, each of the original links represent a part of road constituting an actual road network, the original links extending between a first node and a second node and auxiliary link identification information used for identifying a plurality of alternative links each of the plurality of alternative links replacing at least part of one of the plurality of original links in the map data, and extending between a third node and one of said first node or second node. Applicants respectfully submit that Nomura fails to teach the above-claimed features.

Nomura teaches a map data base apparatus in which map data is segmented into links. The links are segments of road that extend between two nodes. The nodes are always located at a junction point where the segmented road meets another road. In Nomura's system, the road

has various view levels. Thus, as illustrated in Fig. 25 of Nomura, level 4 is a wide view of a segmented road, where level 3 is a view of a small segment of level 4.

The Examiner asserts that a segment of a road viewed at a different level constitutes the claimed alternative links where the full road segment corresponds to the claimed original link. Applicants respectfully disagree.

Applicants respectfully submit that in the embodiment of the present invention, the alternatives links are replacements for the original link due to the original link being changed in some manner. For example, as seen in Fig. 8 of Applicants' specification, an original link extends between nodes Nd3 and Nd4. Fig. 16 illustrates the alternative links (Ld3' and Ld3'') which are the replacements for the original link.

Ld3' extends from node Nd3 to new node Nd12 and alternative link Ld3'' extends from new node Nd12 to Nd4. Thus, the alternative links are not merely a zoomed view of a segment of the original link but constitutes new segments of road to replace the original link.

Applicants note that claims 1-4 have been amended to more clearly define the above described features of Applicants' present invention. Thus, in view of the above arguments and the amendments to the claims, Applicants respectfully submit that Nomura fails to teach Applicants' features as recited in independent claims 1 and 4. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

CONCLUSION

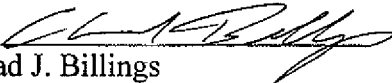
For at least the reasons above, it is respectfully submitted that claims 1-8 are distinguishable over the cited art. Favorable consideration and proper allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings, Reg. No. 48,917 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§ 1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

By 
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